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Attorneys for Petitioner

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

EUGENE DIVISION

KIPLAND KINKEL,

Petitioner,

v.

UNOPPOSED MOTION FOR LEAVE TO FILE AN EXTENDED REPLY

Case No.: 6:11-cv-6244-AA

GERALD LONG, Superintendent, Oregon State Correctional Institution,

Respondent.

Petitioner moves this Court for an order granting leave to file an extended reply of up to 95 pages in response to Respondent's Responses to Petition for Writ of Habeas Corpus (Dkt. No. 20, Dkt. No. 103). Pursuant to L.R. 7-1(a), counsel for petitioner

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certifies that counsel for respondent, Samuel A. Kubernick, has been contacted and does not object to this motion.

This motion is made pursuant to L.R. 7-2(b) and the attached declaration of counsel.

DATED: February 25, 2021

Respectfully submitted,

S/THADDEUS BETZ
THADDEUS BETZ OSB #062745
Attorney for Petitioner